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Attorneys for Plaintiffs  
HA NGUYEN, ALEX BHAGATRAM,  
ALICIA TAYLOR, SORAYA LODIN,  
TEYANI CISNEROS, and MICHAEL WEBSTER  
and the Class and Collective

*[defense counsel on next page]*

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

HA NGUYEN, ALEX BHAGATRAM,  
ALICIA TAYLOR, SORAYA LODIN,  
TEYANI CISNEROS, and  
MICHAEL WEBSTER, individuals,  
on behalf of themselves and all others  
similarly situated,

*Plaintiffs,*

vs.

BLOOMINGDALE'S, LLC; MACY'S, INC.;  
and DOES 1 through 100, inclusive,

*Defendants.*

Case No. 4:23-cv-00768-YGR

**STIPULATION TO EXTEND TIME  
TO FILE RESPONSE TO CLASS AND  
COLLECTIVE ACTION COMPLAINT**

**[L.R. 6-1(a)]**

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15 Attorneys for Defendants  
16 BLOOMINGDALE'S, LLC and MACY'S, INC.  
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**STIPULATION TO EXTEND TIME TO FILE RESPONSE TO  
CLASS AND COLLECTIVE ACTION COMPLAINT**

TO THE HONORABLE COURT:

WHEREAS, Plaintiffs Ha Nguyen, Alex Bhagatram, Alicia Taylor, Soraya Lodin, Teyani Cisneros, and Michael Webster (“Plaintiffs”) filed their Class and Collective Action Complaint (“Complaint”) on February 21, 2023 [Dkt. 1], and served their Complaint on Defendants Bloomingdale’s, LLC and Macy’s, Inc. (“Defendants”) on February 27, 2023 [Dkt. 9, 10];

WHEREAS, the Parties agreed to two prior extensions of Defendants’ responsive pleading deadline [Dkt. 12];

WHEREAS, Defendants’ response to Plaintiffs’ Complaint is currently due on May 1, 2023; and

WHEREAS, the extension will not alter the date of any event or any deadline already fixed by Court order;

NOW, THEREFORE, IT IS HEREBY STIPULATED, pursuant to Local Rule 6-1(a), by and between the Parties, through their undersigned counsel, that Defendants shall have an extension of time up to and including May 22, 2023, to file a response to Plaintiffs’ Complaint.

Respectfully submitted,

Dated: April 26, 2023

SCHNEIDER WALLACE  
COTTRELL KONECKY LLP

By: /s/ Eugene Zinovyev

Carolyn H. Cottrell  
Ori Edelstein  
Eugene Zinovyev

Attorneys for Plaintiffs HA NGUYEN,  
ALEX BHAGATRAM, ALICIA TAYLOR,  
SORAYA LODIN, TEYANI CISNEROS,  
and MICHAEL WEBSTER and the Class  
and Collective

1 Dated: April 26, 2023

JACKSON LEWIS P.C.

2  
3 By: /s/ Erika M. Barbara

Cary G. Palmer

4 Erika M. Barbara

5 Philip J. Smith

Attorneys for Defendants

6 BLOOMINGDALE'S, LLC and

7 MACY'S, INC.

8 **SIGNATURE ATTESTATION**

9 I hereby attest that all signatories listed above, on whose behalf this stipulation is submitted,  
10 concur in the filing's content and have authorized the filing.

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12 Dated: April 26, 2023

/s/ Erika M. Barbara

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